## UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

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Chapter 15

In re:

Case No. 10-31234 (DDT)us

WHITE BIRCH PAPER COMPANY, et al., 1

Jointly Administered

Debtors in a Foreign Proceeding.

## NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that Raniero D'Aversa, Jr. of Orrick, Herrington & Sutcliffe LLP hereby enters his appearance in the above-captioned cases on behalf of Kingsland Capital Management LLC pursuant to Rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure and Sections 342 and 1109(b) of Title 11 of the United States Code (the "Bankruptcy Code"), and requests copies of all notices given or required to be given in these cases and all papers served in these cases (including, but not limited to, all papers filed and served in all adversary proceedings in these cases, and all notices mailed only to parties who filed with the court a request that all notices to be mailed to them) be given to and served as follows:

ORRICK HERRINGTON & SUTCLIFFE LLP 666 Fifth Avenue
New York, NY 10103-0001
Attention: Raniero D'Aversa, Jr., Esq.

Telephone: (212) 506-5000 Facsimile: (212) 506-5151 Email: rdaversa@orrick.com

<sup>&</sup>lt;sup>1</sup> The Debtors in these cases are: White Birch Paper Company ("White Birch Paper"); Papier Masson Ltee ("Papier Masson"); Stadacona General Partner, Inc. ("Stadacona GP"); Stadacona Limited Partnership ("Stadacona LP"); F.F. Soucy Limited Partnership ("FF Soucy LP"); and F.F. Soucy Inc. & Partners, Limited Partnership ("FF Soucy & Partners LP"). The Debtors' U.S. service address is 80 Field Point Road, Greenwich, Connecticut 06830.

PLEASE TAKE FURTHER NOTICE that pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing request includes not only notices and papers referred to in the rules specified above, but also includes, without limitation, all orders and notice of any application, motion, order, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, telecopy or otherwise, which affects the debtors or the property of the debtors.

PLEASE TAKE FURTHER NOTICE that demand is also made that the undersigned be added to the notice list for notice of all contested matters, adversary proceedings, and other proceedings in these cases.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance shall not be deemed or construed to be a waiver by Kingsland Capital: (1) of the right to have final orders in non-core matters entered only after de novo review by a District Court Judge; (2) of the right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (3) of the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) of any other rights, claims, actions, setoffs, or recoupments to which Kingsland Capital is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Kingsland Capital expressly reserves.

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## **PLEASE TAKE FURTHER NOTICE** that the undersigned hereby consents to e-mail service as may be given in this case.

Dated: New York, New York February 25, 2010 ORRICK, HERRINGTON & SUTCLIFFE LLP

By:

Raniero D'Aversa, Jr., Esq.

666 Fifth Avenue

New York, NY 10103-0001 Telephone: (212) 506-5000 Facsimile: (212) 506-5151

Counsel for Kingsland Capital Management LLC